

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

STEPHEN M. WILSON, *et al.*,

Plaintiffs,

v.

**IMAGESAT INTERNATIONAL
N.V., *et al.*,**

Defendants.

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Docket No. 07 Civ. 6176 (LTS)

**DECLARATION OF
MICHAEL FEDERMANN**

1. I, the undersigned, Michael Federmann, am over eighteen (18) years of age, have my full mental faculty and am competent to make this Declaration. The facts set forth in this Declaration are within my personal knowledge and are true and correct.

2. I am a citizen of the State of Israel, where I now live.

3. I have never traveled to, or been present in, the State of New York in connection with the activities and/or meetings of the Board of Directors of ImageSat International, N. V. ("ImageSat"), ImageSat itself or any of the business activities made the subject of this lawsuit. Furthermore, while I have met some of the Plaintiffs elsewhere, to the best of my recollection, I have never met with any of the Plaintiffs within the State of New York.

4. I have traveled to the State of New York sporadically in the past. I typically travel there perhaps two to five times a year. My primary personal reason to stop in New York is to visit a close relative who owns an apartment there. I, however, do not own, directly or indirectly, any right, title, or interest in the apartment that is owned by my relative. Such personal trips occur on average once a year, but have occasionally

occurred twice a year. Also, I have made occasional visits to the State of New York for sporadic, limited business activities that were not related in any way to ImageSat or the claims or allegations set forth in Plaintiffs' Complaint. Most often, my contacts with New York occurred as a point of transit while traveling to other destinations within the United States or en route from the United States returning to my domicile in the State of Israel.

5. To the best of my knowledge, I served on the Board of Directors of ImageSat from the end of 2001, and resigned from this Board on September 5, 2002. To the extent I possess any records, documents and/or things that are in any way related to the activities of ImageSat or its Board of Directors, such things would be located in the State of Israel. None of my records of any of my business activity have ever been or are now located in New York, regardless of whether such records are related to ImageSat, the lawsuit or any of the parties to it.

6. I do not now own, nor have I ever directly or indirectly owned, property or rented or had an office or a residence in the State of New York.

7. I do not now have, nor have I ever had, an agent or employee who handles or has handled any business on my behalf in the State of New York.

8. I do not now have, nor have I ever had, any bank accounts in the State of New York.

9. I do not now have, nor have I ever had, a driver's license or been registered to vote or had any other type of license issued by the State of New York.

10. I have never advertised or distributed any publication in the State of New York, nor been broadcast on any program in the State of New York.

11. I do not now own, nor have I ever owned, an automobile or any vehicle licensed or registered by the State of New York.
12. I do not now have, nor have I ever had, a post office box, telephone number or any automatic answering service in the State of New York.
13. I do not hold any professional license granted by the State of New York.
14. With the exception of the current proceeding, I have never been named as a party to any other lawsuit or administrative proceeding in the State of New York.
15. Apart from the trips set forth above, I have not made any personal or business trips to the State of New York.
16. Defending myself against the claims made in the Complaint in the State of New York instead of in my home country of Israel will inflict an unforeseen and significant toll on me as I would be required to travel to New York and participate in an unfamiliar, foreign, time-consuming and expensive legal process in English, which is not my primary language.
17. Because I am resident within the State of Israel, I would submit to the jurisdiction of the courts within my home country. I have never consented to jurisdiction in the State of New York.

I declare under the penalty of perjury that the foregoing is true and correct.

This 11 Day of October, 2007.


MICHAEL FEDERMANN